

AO 91 (Rev. 08/09) Criminal Complaint

FILED**UNITED STATES DISTRICT COURT****UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO**

for the

District of New Mexico

JUL 21 2014

United States of America)

v.)

Michael Ace Yonnie)
(registered with the Navajo Nation))

Case No.

**MATTHEW J. DYKMAN
CLERK****MS 14-2475***Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 18, 2014 in the county of Sandoval in the
District of New Mexico, the defendant(s) violated:*Code Section*

18 U.S.C. Sections 1153 and 1111

Offense Description

The unlawful killing of John Doe 1 and John Doe 2 with premeditation and malice aforethought within the special territorial jurisdiction of the United States, specifically the Navajo Nation Reservation.

This criminal complaint is based on these facts:

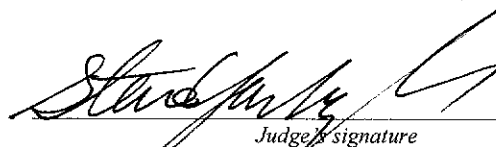
See attached affidavit

☒ Continued on the attached sheet.
Complainant's signature

Ross Zuercher, Special Agent - FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 7/21/14City and state: Albuquerque, New Mexico
Judge's signatureSteven C. Yarbrough
Printed name and title

AFFIDAVIT

Your Affiant, Ross Zuercher, having been duly sworn, does hereby depose and say:

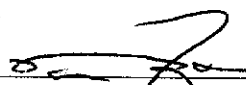
Introduction

1. I have been a Special Agent (SA) of the Federal Bureau of Investigation (FBI), United States Department of Justice, since August 2012. As such, I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request arrest warrants. I am currently assigned to the FBI's Albuquerque Violent Crime Program, as such, I am authorized to investigate crimes occurring in Indian Country. The information set forth in this affidavit was derived from my own investigation and/or communicated to me by other sworn law enforcement officers of the Navajo Nation Police Department. Because this affidavit is submitted for the limited purpose of securing an arrest warrant, your Affiant has not included each and every fact known to me concerning this investigation. Your Affiant has set forth only those facts that your Affiant believes are necessary to establish that probable cause to support a criminal complaint against Michael Ace Yonnie in violation of Title 18 U.S.C. §§ 1153 and 1111.

Details of Investigation

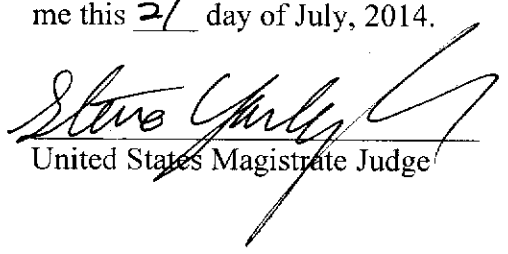
2. On July 18, 2014, the FBI responded to a call from the Navajo Nation Police Department (NNPD) regarding a possible double homicide occurring within the exterior boundaries of the Torreon Chapter of the Navajo Nation in the State of New Mexico, within the County of Sandoval.
3. SA Zuercher met NNPD Criminal Investigator (CI) Donovan Becenti. CI Becenti reported that the first victim, John Doe 1, and his girlfriend, Jane Doe 1, were walking down Torreon Mission Road to a festival/rodeo in Dulce, New Mexico. John Doe 1 was attacked on the side of the road by Jane Doe 1's son, MICHAEL "ACE" YONNIE (ACE). ACE used a knife to attack John Doe 1. Jane Doe 1 ran to get help at a nearby house. The police were notified about the attack, and Jane Doe 1 returned to where John Doe 1 was laying on the ground. Jane Doe 1 said that ACE had left the area. The attack resulted in the death of John Doe 1.
4. A few minutes later, ACE arrived at John Doe 2 and Jane Doe 2's residence which was approximately one half mile from where John Doe 1 was attacked. Upon arrival, ACE asked where John Doe 2 and Jane Doe 2's son was located. Neither John Doe 2 nor Jane Doe 2 responded. ACE pulled out a knife, and Jane Doe 2 ran inside the house. ACE then attacked John Doe 2 with the knife and left the residence. The attack resulted in the death of John Doe 2.

5. Jane Doe 2 and her two sons wrapped John Doe 2 with towels and put him in the back of their truck to drive John Doe 2 to the hospital. As they drove down Torreon Mission Road, they saw paramedics attending to John Doe 1 who was lying on the side of the road. They pulled the truck carrying John Doe 2 to the side of the road so that the paramedics could give medical attention to John Doe 2. Both victims died in the vicinity of the first attack.
6. NNPD arrived at ACE'S house located near the two attacks. NNPD said that ACE walked out of the house, threw a knife on the ground, and surrendered to NNPD. The knife was collected as evidence by NNPD.
7. ACE was interviewed by SAs Ross Zuercher and Leroy Chavez. After being advised of the identity of the interviewing agents, read his Miranda rights, and agreeing to speak to the agents without an attorney present, ACE admitted to stabbing both John Doe 1 and John Doe 2 with a knife. ACE also told the agents of other potential people he had planned on killing.
8. MICHAEL ACE YONNIE is enrolled with the Navajo Nation.
9. John Doe 1 is enrolled with the Navajo Nation.
10. John Doe 2 is enrolled with the Navajo Nation.
11. Based on all of the above information, your Affiant submits there is probable cause to believe that MICHAEL ACE YONNIE, an Indian, violated 18 U.S.C. §§ 1153 and 1111, in that he did unlawfully kill John Doe 1 and John Doe 2 with premeditation and malice aforethought within the special territorial jurisdiction of the United States, specifically the Navajo Nation Reservation. Your Affiant requests an arrest warrant based upon the criminal complaint in this matter.
12. Assistant United States Attorney Glynette Carson-McNabb has authorized federal prosecution in this matter.
13. I swear that this information is true and correct to the best of my knowledge.



Ross Zuercher, Special Agent - FBI

SUBSCRIBED and SWORN to before
me this 21 day of July, 2014.



United States Magistrate Judge